

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

NAVELLIER & ASSOCIATES, INC.,
and LOUIS NAVELLIER,

Defendants.

Civil Action No. 1:17-cv-11633

**DEFENDANTS' RENEWED ASSENTED-TO REQUEST TO FILE REPLY
MEMORANDUM IN SUPPORT OF MOTION TO STAY ENFORCEMENT PENDING
APPEAL AND/OR REDUCED SUPERSEDEAS BOND AND REQUEST TO FILE
REPLY MEMORANDUM IN SUPPORT OF REQUEST TO FILE LOUIS NAVELLIER
DECLARATION AND FINANCIAL INFORMATION IN SUPPORT OF SAID
STAY/REDUCED SUPERSEDEAS BOND UNDER SEAL**

Defendants are preparing and are in the process of completing their reply memorandum in response to the SEC's responsive memorandum opposing Defendants' motion for stay pending appeal and/or to reduce supersedeas bond, and Defendants' reply to the SEC's opposition to filing under seal Louis Navellier's declaration and financial information in support of said motion. The SEC has assented to Defendants' filing a reply to the SEC's opposition to Defendants' stay/reduced supersedeas bond motion, and assented to Defendants filing a reply in support of the motion to seal.

Defendants made that motion for leave to file said reply memoranda and notified the Court of the SEC's assent, but has not as yet received an order granting leave to file said replies.

Defendants hereby renew their request for leave to file said reply memoranda which can be filed in the next few days, i.e., on or before July 9, 2020. The SEC's oppositions were not received until yesterday, July 6, 2020, so Defendants need a few days to prepare and complete their replies, which should be ready for filing by July 9, 2020 at the latest, and probably by tomorrow, July 8, 2020.

There are numerous misstatements of fact and law in the SEC's oppositions, which the Court should be made aware of, so that full and fair consideration, based on accurate factual and legal arguments, can be made by the Court before rendering a decision on these motions.

Therefore, Defendants renew their request for the Court to allow the filing of said reply memoranda in support of motion to stay/reduce supersedeas bond, and in support of motion to file Louis Navellier's declaration and financial information under seal.

Respectfully submitted,

DATED: July 7, 2020

LAW OFFICES OF SAMUEL KORNHAUSER

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Attorneys for Defendants

LOCAL RULE 7.1 CERTIFICATION

On July 7, 2020 the undersigned met and conferred with SEC counsel, which assented to filing a reply to Defendants' motion to file Louis Navellier's declaration and financial information under seal.

Dated: July 7, 2020

By: /s/ Samuel Kornhauser
Samuel Kornhauser

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed on this date through the ECF system and will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF) as of this date of this filing.

July 7, 2020

By: Dan Cowan
Dan Cowan